LILLIAN E. DONALDSON and THEODORE DONALDSON, her husband COMPLAINANTS

VS.

MARGARET G. CONAWAY and BAILEY CONAWAY, her husband; AGNES RIGGS, widow; CHARLES HENRY RIGGS, unmarried; SARAH HARRIET RIGGS, unmarried; JAMES EDWARD RIGGS, unmarried; MARY ANN JOHNSON and ROBERT HENRY JOHNSON, her husband; AGNES DORA MOSLEY and FRANKLIN HILL MOSLEY, her husband; EFFIE MATILDA DAVIDSON and JUNIUS HENDERSON DAVIDSON, her husband; WILLIAM KENNETH RIGGS and ELEANOR GRAHAM RIGGS, his wife; HELEN LOUISE GILCHRIST and JAMES WALTER GILCHRIST, her husband; IRENE POTTS RIGGS, widow; : LEWIS CALVIN JAMES, JR., widower; MARY AGNES TURNER and WINFORD TURNER, : IN EQUITY her husband; LAURA ALMEDIA JAMES ESSEX and THOMAS ESSEX, her husband; MARGARET VIRGINIA JAMES JENKINS and EDWARD JENKINS, her husband; WILLIAM HENRY JAMES, unmarried; MATTHEW CALVIN JAMES, unmarried; IRMA CATHERINE JUSTINE JAMES, unmarried; KENNETH CONWAY JAMES, Unmarried; CHARLOTTE LEVENOR JAMES, unmarried; ROGER RANDOLPH JAMES, unmarried and ALTA :: EFFIE ANN JAMES, unmarried

NO. 18873 EQUITY.

: IN THE CIRCUIT COURT

FOR FREDERICK COUNTY,

MARYLAND

TO THE HONORABLE, THE JUDGES OF SAID COURT:

DEFENDANTS

The Bill of Complaint of Lillian E. Donaldson and Theodore Donaldson, her husband, by E. Austin James, their Solicitor, respectfully shows:

That Minnie E. Riggs died intestate on or about the 30th day of May, 1938, seized of valuable real estate situate lying and being in Frederick County, Maryland, as follows, to wit:

All that lot or parcel of ground situate, lying and being in New Market Election District, Frederick County, Maryland, being part of a tract of land called "The ReSurvey On The Land of Promise" and being on the west side of the public road leading from Kemptown to Barthlows Switch on the Baltimore & Ohio Railroad, and adjoining the land of Edmund Purdum and Monroe Mount,

E. AUSTIN JAMES ATTORNEY AND COUNSELLOR FREDERICK, MD.